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25 **UNITED STATES DISTRICT COURT
26 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

27 CHASOM BROWN, MONIQUE

28 TRUJILLO, WILLIAM BYATT, JEREMY

DAVIS, and CHRISTOPHER CASTILLO,

individually and on behalf of all similarly
situated,

29 Plaintiffs,

30 v.

31 GOOGLE LLC,

32 Defendant.

33 Case No. 4:20-cv-03664-YGR-SVK

34 **JOINT STIPULATION AND [PROPOSED]
35 ORDER EXTENDING TIME FOR
36 SUBMITTING DECLARATIONS IN
37 SUPPORT OF SEALING (DKTS. 660, 671)
38 AND RESPONDING TO PLAINTIFFS'
39 ADMINISTRATIVE MOTION (DKT. 672)**

40 The Honorable Susan van Keulen

41 Case No. 4:20-cv-03664-YGR-SVK

42 **JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING
43 TIME FOR SUBMITTING DECLARATIONS IN SUPPORT OF SEALING (DKTS. 660, 671)
44 AND RESPONDING TO PLAINTIFFS' ADMINISTRATIVE MOTION (672)**

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between
 2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 **Google’s Motion to Seal (Dkt. 660)**

4 WHEREAS, on August 5, 2022, Google filed its Administrative Motion to Consider
 5 Whether Another Party’s Material Should Be Sealed (“Google’s Motion to Seal”) (Dkt. 660);

6 WHEREAS, on August 5, 2022, Plaintiffs received unredacted copies of Google’s Motion
 7 to Seal and exhibits cited in Dkt. 666;

8 WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Plaintiffs, as the
 9 Designating Party to portions of Google’s Motion to Seal (Dkt. 660), to establish that such
 10 designated material is sealable, is Friday, August 12, 2022;

11 WHEREAS, Plaintiffs have requested, and Google does not oppose an extension of time of
 12 14 days to Friday, August 26, 2022, which Plaintiffs have represented will provide them with
 13 sufficient time to submit their declaration in support of the designated materials in the filings (Dkt.
 14 660);

15 **Plaintiffs’ Motion to Seal (Dkt. 671)**

16 WHEREAS, on August 8, 2022, Plaintiffs filed their Administration Motion to Consider
 17 Whether Google’s Material Should Be Sealed (“Plaintiffs’ Motion to Seal”) (Dkt. 671);

18 WHEREAS, on August 8, 2022, Google received unredacted copies of Plaintiffs’ Motion to
 19 Seal and exhibits cited in Dkt. 672;

20 WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the
 21 Designating Party to portions of Plaintiffs’ Motion to Seal (Dkt. 671), to establish that such
 22 designated material is sealable, is Monday, August 15, 2022;

23 WHEREAS, Google has requested, and Plaintiffs do not oppose an extension of time of 14
 24 days to Monday, August 29, 2022, which Google has represented will provide it with sufficient time
 25 to submit its declaration in support of the designated materials in the filings (Dkt. 671);

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1 **Plaintiffs' Motion Concerning Withheld Privileged Documents**

2 WHEREAS, on August 8, 2022, Plaintiffs filed their Administrative Motion for Relief re
 3 Google's Production of Documents Improperly Withheld as Privileged ("Plaintiffs' Motion
 4 Concerning Withheld Privileged Documents") (Dkt. 672);

5 WHEREAS, Google's current deadline to respond to Plaintiffs' Motion Concerning
 6 Withheld Privileged Documents is Friday, August 12, 2022;

7 WHEREAS, Google has requested, and Plaintiffs do not oppose an extension of time until
 8 Tuesday, August 16, 2022, for Google to respond to Plaintiffs' Motion Concerning Withheld
 9 Privileged Documents;

10 NOW THEREFORE, the Parties stipulate to extend the deadline by which:

11 1. Google shall respond to Plaintiffs' Motion Concerning Withheld Privileged Documents
 12 (Dkt. 672), to Tuesday, August 16, 2022;

13 2. Plaintiffs shall submit a Declaration in support of Google's Motion to Seal (Dkt. 660),
 14 to Friday, August 26, 2022; and

15 3. Google shall submit a Declaration in support of Plaintiffs' Motion to Seal (Dkt. 671), to
 16 Monday, August 29, 2022.

17 DATED: August 9, 2022

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 19 SULLIVAN, LLP

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72 *Attorneys for Plaintiffs*

1 **ATTESTATION OF CONCURRENCE**

2 I am the ECF user whose ID and password are being used to file this JOINT STIPULATION
3 AND [PROPOSED] ORDER EXTENDING TIME FOR SUBMITTIN DECLARATIONS IN
4 SUPPORT OF SEALING (DKTS. 660, 671) AND RESPONDING TO PLAINTIFFS'
5 ADMINISTRATIVE MOTION (DKT. 672). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that
6 each of the signatories identified above has concurred in the filing of this document

7 Dated: August 9, 2022

8 By /s/ Michael F. Ram

9 Michael F. Ram

10 *Counsel on behalf of Plaintiffs*

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[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS**:

The deadline for Google to respond to Plaintiffs' Motion for Relief re Google Documents Improperly Withheld as Privileged (Dkt. 672), shall be extended to August 16, 2022.

The deadline for Plaintiffs to submit a Declaration in support of Google’s Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (Dkt. 660), shall be extended to August 26, 2022.

The deadline for Google to submit a Declaration in support of Plaintiffs' Administrative Motion to Consider Whether Google's Material Should Be Sealed (Dkt. 671), shall be extended to August 29, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED:

HON. SUSAN VAN KEULEN
United States Magistrate Judge